

STEVEN G. KALAR
Federal Public Defender
CANDIS MITHCELL
Assistant Federal Public Defender
450 Golden Gate Avenue
San Francisco, CA 94102
Telephone: 415.436.7700
Facsimile: 415.436.7706
candis_mitchell@fd.org

Counsel for Defendant Carlos Vasquez

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

United States of America,

Plaintiff,

v.

Carlos Vasquez,

Defendant.

Case Number: cr13-0335-SI

Date: March 21, 2014

Time: 11:00 a.m.

**STIPULATION AND ~~[PROPOSED]~~
ORDER CONTINUING MATTER AND
EXCLUDING TIME UNDER 18 U.S.C. §
3161**

On February 7, 2014, the parties made a status appearance before the Court. During that appearance, the government explained that it intended to seek another indictment against the defendant. The parties requested that the matter be continued until March 21, 2014.

On March 6, 2014, Mr. Vasquez was charged in an indictment, case number cr-14-120-CRB, alleging violation of numerous counts, including 18 U.S.C. § 1962(d) — Racketeering Conspiracy; 18 U.S.C. § 1959 (a)(5) — Conspiracy to Commit Murder in Aid of Racketeering Activity; 18 U.S.C. § 1959 (a)(6) — Conspiracy to Commit Assault with a Dangerous Weapon in Aid of Racketeering Activity; 18 U.S.C. §§ 1959(a)(1) and 2 — Murder in Aid of Racketeering Activity; 18 U.S.C. §§ 924(c)(1)(A) and 2 — Possession, Carrying, and Using a Firearm in Furtherance of, or During and in Relation to, a Crime of Violence; and 18 U.S.C. §§ 924(j) and (2) — Use/Possession of Firearm in Furtherance of Crime of

[Proposed] Stipulation to Continue and Exclude Time
cr-13-0335 SI

1 Violence, Resulting in Death.

2 In light of the pending charges against Mr. Vasquez in the newly charged case, the parties request
3 that this case be continued for three months to June 27, 2014, so that defense counsel will have an
4 opportunity to evaluate the new charges and advise Mr. Vasquez accordingly.

5 The parties request that the time between March 21, 2014, and June 27, 2014, be excluded from
6 the running of the speedy trial clock for effective preparation of counsel, 18 U.S.C. § 3161(h)(7)(B)(iv).

7
8 SO STIPULATED:
9

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11 Dated: March 14, 2014

/s/ Andrew M. Scoble
ANDREW M. SCOBLE
Assistant United States Attorney

13
14 /s/ Natalie Lee
NATALIE LEE
Assistant United States Attorney

15
16 Dated: March 14, 2014

/s/ Candis Mitchell
CANDIS MITCHELL
Attorney for Defendant Carlos Vasquez

[PROPOSED] Order

For the reasons stated above, this matter is continued until June 27, 2014, for another status. The Court finds that the exclusion of time from March 21, 2014, through June 27, 2014, is warranted and that the failure to grant the requested continuance would deny the defendant effective preparation of counsel and would result in a miscarriage of justice. 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: 3/14/14



THE HONORABLE SUSAN ILLSTON
United States District Judge